

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION (CINCINNATI)**

**UNITED STATES OF AMERICA,
Plaintiff,**

vs.

**: CASE NO. 1:23-cv-176
: JUDGE**

**LIFETIME HEALTH &
TRANSPORTATION SERVICE, LLC
and PIERRE BROWN,
Defendants.**

COMPLAINT

Now comes the United States of America, by and through its legal representative, the United States Attorney for the Southern District of Ohio, and for its cause of action alleges:

1. Jurisdiction is founded on 28 U.S.C. § 1345.
2. Defendants operate and/or live within this judicial district and division.
3. On August 19, 2021 Defendant, Lifetime Fitness & Transportation Service, LLC, agreed to pay \$189,379.01 in back wages to 191 employees by December 31, 2021 pursuant to a signed WH-56 Summary of Unpaid Wages and Back Wage Payment Agreement. Said Agreement was signed by the firm's 203(d) employer and owner, Pierre Brown. The firm failed to make full payment. Said Agreement was entered into between the parties in connection with violation of the Fair Labor Standards Act of 1938 (29 U.S.C. § 201 et seq). A true copy of said Agreement is attached hereto, marked as Exhibit A, and by this reference made a part hereof.
4. Although payment has been demanded, full payment has not been made by the Defendants and the entire balance has become due and payable.
5. After all payments have been properly credited, the entire unpaid balance due and

owing to Plaintiff from Defendants is \$191,101.73 (principal balance in the amount of \$178,415.76 plus accrued interest from January 1, 2022 at the annual rate of 1 percent, plus additional charges including penalties and administrative costs of \$10,822.26), all of which is evidenced by the Certificate of Indebtedness which is attached hereto, marked as Exhibit B, and by this reference made a part hereof.

WHEREFORE, Plaintiff prays for judgment against Defendants in the amount of \$191,101.73 (principal balance in the amount of \$178,415.76 plus accrued interest from January 1, 2022 at the annual rate of 1 percent, plus additional charges including penalties and administrative costs of \$10,822.26) and for all further relief to which Plaintiff is entitled.

Plaintiff further prays for its costs and for an award of post-judgment interest at the highest rate allowable by law, and for all further just and proper orders.

Respectfully submitted,

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United States Attorney

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